

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

VICTOR JAMES COMFORTE, II
and BRENDAN MICHAEL CARR,
individually, and on behalf of all
others similarly situated,

Plaintiffs,

v.

CAMBRIDGE ANALYTICA,
FACEBOOK, INC.,
MARK ZUCKERBERG, and
JOHN and JANE DOES 1-100,

Defendants.

Civil Action No. 1:18-cv-02120
Hon. Elaine E. Bucklo

**JOINT MOTION FOR AN EXTENSION OF TIME FOR DEFENDANTS
FACEBOOK, INC. AND MARK ZUCKERBERG TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFFS' COMPLAINT**

Defendants Facebook, Inc. ("Facebook") and Mark Zuckerberg (collectively, "Facebook Defendants") and Plaintiffs Victor James Comforte, II and Brendan Michael Carr (collectively, "Plaintiffs"), by and through their undersigned counsel of record, hereby move this Court for an extension of time for Facebook Defendants to answer or otherwise respond to Plaintiffs' Class Action Complaint.

Plaintiffs filed the Class Action Complaint in the instant case on March 22, 2018. *See* Dkt. No. 1. Plaintiffs served Facebook with the Class Action Complaint on April 2, 2018. Facebook's response to Plaintiffs' Complaint is currently due on April 23, 2018.

The instant case is one of eleven similar putative federal class actions filed to date in five federal district courts (collectively the "Facebook Consumer Class Actions"). On March 30, 2018, the plaintiffs in one of these actions filed a motion with the Judicial Panel on Multi-

District Litigation (the “JPML”) seeking to have the Facebook Consumer Class Actions transferred and consolidated before one court under the MDL procedure. Dkt. No. 5; *see also* MDL No. 2843, Dkt. No. 1. Facebook filed a response to the motion, in which Facebook agreed that the Facebook Consumer Class Actions should be transferred for coordinated and consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. *See* MDL No. 2843, Dkt. No. 19. Plaintiffs in two of the other Facebook Consumer Class Actions have also filed, or have indicated that they intend to file, memoranda in support of transfer and consolidation (MDL No. 2843, Dkt. Nos. 7 & 9).

The parties have conferred and agree that undersigned counsel will accept service of the Class Action Complaint on behalf of Defendant Zuckerberg, and that the deadline for Facebook Defendants to answer or otherwise respond to the Class Action Complaint should be extended until 30 days after the JPML issues a decision on the motion. The parties believe that this brief extension will conserve judicial resources, avoid duplicative litigation, and promote efficiency. This joint request for an extension of time is the first motion for an extension of time by either party in the instant action.

Therefore, the parties hereby respectfully request that the Court enter an order extending the deadline for Facebook Defendants to answer or otherwise respond to Plaintiffs’ Class Action Complaint until 30 days after the JPML issues a decision on the motion for transfer and consolidation.

DATED: April 6, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that he electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Nathan P. Eimer